

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

In re:

GERRY O'NEIL, JR.

Chapter 13

Case No. 18-03270-swd

Honorable Scott W. Dales

Filed: July 29, 2018

Confirmed: December 9, 2018

Debtor.

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DEBTOR'S OBJECTION TO TRUSTEE'S MOTION TO DISMISS

On August 26, 2020, the Chapter 13 Trustee in this case filed a Motion to Dismiss because the plan is no longer feasible. The Debtor objects to the Trustee's Motion to Dismiss for the following reasons:

1. The Debtor is a General Motors employee.
2. During the term of the Plan, the Debtor's income has been impacted by the the GM strike, the COVID-19 shut-down, and medical concerns.
3. During the term of the Plan, the Debtor's household expenses have, at times, been substantially higher than anticipated.
4. Notwithstanding, the Debtor anticipates having the ability to devote bonus income and/or income tax refunds over the course of the remaining term of the Plan, sufficient to restore feasibility.
5. The Debtor intends to amend his Chapter 13 plan in order to restore feasibility.

Respectfully submitted,

SAVAGE LEGAL GROUP, PC

By: /s/ Kimberly L. Savage
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Dated: September 25, 2020